

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN (BALTIMORE) DISTRICT OF MARYLAND**

DAVID J. BOSHEA

Plaintiff,

v.

COMPASS MARKETING, INC.

Defendant.

Case No. 1:21-CV-00309-ELH

* * * * *

**PLAINTIFF’S UNCONTESTED MOTION FOR
LEAVE TO FILE HIS AMENDED COMPLAINT**

Plaintiff, David J. Boshea (“Boshea”) moves this Court for an order granting him leave to file his amended complaint to clarify the issues in this lawsuit:

1. On February 5, 2021, Boshea filed his two-count complaint against Compass Marketing, Inc. (“Compass”) for breach of contract in Count I and violation of the Maryland Wage Payment and Collection Act in Count II (the “Complaint”).
2. At the time Boshea filed the Complaint, additional sums owing for severance had not come due. As a result, Boshea drafted the Complaint referring to sums that would come due after he filed this lawsuit and would be a part of his damages if not paid.
3. Compass did not pay Boshea, so the prospective damages allegations have become unnecessary.
4. Boshea proposes to file the amended complaint, which he has attached as Exhibit 1, (the “Amended Complaint”) to clarify the issues.
5. Boshea seeks leave to file the Amended Complaint, which does not set forth changes that substantively change Boshea’s cause of action but does clarify the facts for the benefit of the parties, the Court, and any jury that the Court may convene.

6. Boshea has attached a redline version of the proposed Amended Complaint, attached as Exhibit 2.
7. Boshea consulted with Compass' counsel, who does not object to the relief sought in this motion.

Wherefore, David John Boshea request leave to file and have considered the attached Amended Complaint for Breach of Contract and such other proper relief.

Dated: June 16, 2021

DAVID J. BOSHEA

/s/ Gregory J. Jordan

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COUNSEL FOR DAVID J. BOSHEA

CERTIFICATE OF SERVICE

Gregory Jordan certifies that he served Plaintiff's Uncontested Motion for Leave to File His Amended Complaint on counsel for Compass Marketing, Inc., by service through the Court's CM/ECF system and by email to stern@kaganstern.com, rudiger@kaganstern.com, and yeung@kaganstern.com on July 29, 2021.

/s/ Gregory J. Jordan
Gregory J. Jordan